

**IN THE UNITED STATES DISTRICT COURT
MIDDLE DISTRICT OF ALABAMA
EASTERN DIVISION**

LORI ANN MORRIS,)
)
PLAINTIFF,)
)
V.) **CIVIL CASE NO. 3:05-CV-962-T**
)
)
FLORIDA TRANSFORMER, INC.,)
and EDWARD NEAL THOMPSON,)
)
)
DEFENDANTS.)

**PLAINTIFF'S LIST OF WITNESSES,
EXHIBITS AND DEPOSITION EXCERPTS**

Comes now the Plaintiff and submits the following as a list of Witnesses, Exhibits and Deposition Excerpts to be used at trial.

A. Witnesses

1. Plaintiff, Lori Ann Morris, c/o Henry L. Penick, 319 17th Street North, Birmingham, Alabama 35203.
(205) 252-2538
2. Dr. Edward L. Robinson, Robinson & Associates, LLC, 233 Oakmont Road, Birmingham, Alabama 35244-3264.
(205) 408-1692
1. Andre LeBleu, LAPTEC, Inc. Engineering Services, 12030 Lakeland Park Boulevard, Suite 109, Baton Rouge, LA 70809.
(225) 751-7535.
4. Trooper Alex Huntley, 1220 Fox Run Parkway A3, Opelika, Alabama 36801
(334) 745-4651
5. Dr. Jack R. Kalin, Ph.D., Alabama Department of Forensic Science, 1001 13th Street South, Birmingham, Alabama 35205
(205) 933-6621

6. Edward Neal Thompson c/o Ball, Ball, Matthews & Novak, P.A.
7. Scott Seay c/o Ball, Ball, Matthews & Novak, P.A.

B. Exhibits

1. The deposition of Dr. Edward L. Robinson and exhibits attached thereto.
2. The deposition of Andre LeBleu and exhibits attached thereto.
3. The deposition of Edward Neal Thompson and the exhibits attached thereto.
4. The deposition of Franklin Scott Seay and the exhibits attached thereto.
5. The deposition of Trooper Alex Huntley and the documents attached thereto.
(Not yet taken)
6. The deposition of Dr. Jack R. Kalin, Ph.D. and exhibits attached thereto.
(Not yet taken)
7. The Alabama Uniform Traffic Accident Report #4524732 in subject accident.
8. The autopsy of Vernell B. Morris.
9. The driver's history of Edward Neal Thompson.
10. The Medical Examination Report of Edward Neal Thompson dated April 26, 2004.
11. Post Accident Driver's Test of Edward Neal Thompson.
12. Medical Records of Edward Neal Thompson from Dr. O. D. Mitchem, M.D.
13. Center Drug Medical charges.
14. Medical records from Dr. Garcia.
15. Medical records from Community Hospital, Tallassee, Alabama.
16. Report of Dr. Edward L. Robinson & Associates, LLC dated March 17,

2005.

17. Sworn affidavit of Dr. Edward L. Robinson.
18. Death certificate of Vernell B. Morris.
19. Site drawing by Robinson & Associates, LLC.
20. Photographs of stretch marks on seat belt of Kenworth tractor.
21. Curriculum Vitae of Dr. Edward L. Robinson.
22. Sworn affidavit of Andre LeBleu.
23. Resume of Andre LeBleu.
24. Fleet Safety Compliance Manual and Update (June, 1997).
25. Panther II Transportation, Inc. earnings report of Vernell Morris from March 26, 2004 through September 3, 2004.
26. The Certificate of Marriage between Vernell B. Morris and Lori Ann Morris.
27. Marriage photos of Vernell B. Morris and Lori Ann Morris.
28. Photographs of Vernell B. Morris playing guitar.
29. Video tape of Vernell B. Morris playing guitar.
30. Report of Andre LeBleu to Dr. Robinson dated March 28, 2005.
31. Kenworth T600 Brochure is schematics of Kenworth T600 Electrical System.
32. Photographs by Trooper James Patterson.
33. Photographs taken by Robinson & Associates, LLC.
34. Photographs produced by Defendants.
35. Application for employment of Edward Neal Thompson.

36. Statements of violations by Edward Neal Thompson.
37. Driver road tests of Edward Neal Thompson.
38. Dart Transit Company Accident Report dated 9/9/04.
39. General Safety Rules of Florida Transformer.
40. Annual Vehicle Inspection Report dated December 29, 2003.
41. Service history truck number 11.
42. Chad's Truck Repair invoices.
43. The affidavit of Edward Neal Thompson.
44. The affidavit of William Earl Tidwell.
45. Performance appraisals of Edward Neal Thompson dates December 12, 2004.
46. Fuel and Mileage Report forms for Edward Neal Thompson.
47. Driver's license of Edward Neal Thompson.

C. Deposition Excerpts

1. Entire Deposition of Edward L. Robinson; Excerpts pages 5/22 - 7/7; 8/12 - 8/14; 15/23 - 16/13; 19/12 - 20/10; 2/1 - 22/15; 25/13 - 29/8; 42/5 - 43/23; 45/13 - 47/8; 50/13 - 51/1; 53/18 - 53/21; 59/18 - 60/2; 65/4 - 66/10; 66/21 - 67/11; 69/20 - 70/17; 72/10 - 72/15; 75/7 - 78/3; 84/1 - 85/1; 85/21 - 88/8; 9?/19 - 91/14; 93/19 - 96/15; 100/1 - 102/17; 113/19 - 114/9; 133/20 - 135/17; 140/16 - 148/4; 149/10 - 152/5; 155/9 - 155/16; 156/11 - 156/21; 161/18 - 161/162; 163/14 - 164/13; 168/7 - 169/7; 173/18 - 174/21; 185/2 - 185/12; 187/3 - 187/22; 195/10 - 198/15; 208/10 - 211/15; 213/18 - 214/8; 214/22 - 215/12; 218/16 - 219/4; 229/9 - 230/18; 236/12 - 236/19; 237/22 - 238/19; 239/15 - 239/23; 241/20 - 243/12; 244/9 - 246/1; 247/3 - 247/12; 247/3 - 247/12; 272/7 - 273/13.
2. Deposition excerpts of Andre LeBleu: Pages 20/19 - 21/24; 22/10 - 2/19;

25/23 - 26/7; 33/5 - 34/1; 42/3 - 42/8; 46/7 - 46/8; 47/2 - 47/4; 51/19 - 54/15; 65/24 - 66/12; 74/14 - 79/11; 80/21 - 81/8; 85/12 - 87/10; 89/6 - 89/14; 93/22 - 94/11; 95/7 - 95/15; 111/23 - 112/18; 123/4 - 123/16; 127/14 - 127/18; 141/6 - 141/17; 144/7 - 144/21; 146/7 - 147/20; 148/4 - 150/6; 151/6 - 151/25; 154/7 - 156/8; 157/8 - 157/17.

3. Deposition excerpts of Edward Neal Thompson: Pages 5/16 - 5/22; 6/6 - 7/3; 30/5 - 31/10; 35/8 - 36/8; 43/19 - 44/1; 50/19 - 51/11; 53/20 - 54/10; 59/11 - 89/15; 107/17 - 107/23; 112/19 - 112/23; 126/23 - 127/2; 128/17 - 129/22; 133/6 - 133/15; 140/20 - 141/3; 141/8 - 141/12.
4. Deposition of Franklin Scott Sea: Pages 15/11 - 15/17; 16/19 - 16/21; 19/3 - 20/11; 22/22 - 25/1; 25/18 - 25/23; 26/10 - 26/12; 28/11 - 28/14; 30/11 - 30/14; 31/9 - 31/12; 30/8 - 30/10; 39/14 - 39/18; 46/19 - 47/2; 48/8 - 48/13 - 50/10 - 50/15; 60/5 - 60/11.
5. Deposition of James Patterson: Pages 9/9 - 9/23; 10/22 - 11/14; 19/2 - 19/6; 21/20 - 22/17; 25/15 - 25/22; 31/1 - 31/8; 31/13 - 32/3; 33/18 - 34/4; 41/7 - 41/15; 49/6 - 49/9; 51/2 - 51/17; 57/11 - 57/18; 72/7 - 72/17; 89/16 - 90/3; 90/10 - 90/15; 91/19 - 92/5; 95/3 - 95/5; 96/20 - 96/22; 99/15 - 99/19; 105/7 - 105/13; 114/19 - 114/23; 115/12 - 115/16; 126/4 - 126/23; 127/1 - 127/10; 130/8 - 131/8; 133/23 - 134/2.

Respectfully submitted,

/s/ Henry L. Penick
Attorney for Plaintiff

H. L. Penick & Associates, PC.
319 17th Street North, Suite 200
P.O. Box 967
Birmingham, AL 35201-0967
(205) 252-2538

CERTIFICATE OF SERVICE

I hereby certify that the foregoing has been served this the 13th day of September, 2006, by placing same in the United States Mail, first-class postage prepaid and properly addressed as follows:

Richard E. Broughton
W. Evans Brittain
Ball, Ball, Matthews & Novak, PA
2000 Interstate Park Drive
Suite 204
P.O. Box 2148
Montgomery, AL 36102-2148

/s/ Henry L. Penick